



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING




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April 30, 2009

TO: State Board of Education

FROM: Michael P. Flanagan, Chair 

SUBJECT: Presentation on Michigan School Accreditation System (MI-SAS)

In March, 2002, the State Board of Education approved "Education YES!-Michigan's Yardstick for Excellent Schools" as the state's accreditation system to provide a means of setting standards for continuous school improvement. Since that time, the Board has made significant policy changes, including curriculum standards and accountability criteria. In addition to policy changes, educators, parents, and employers have identified concerns with the system and made numerous recommendations to make it more understandable and transparent.

As a result, the Michigan Department of Education staff determined a major redesign of the current system was needed. A stakeholder group was convened to evaluate the current system, review the statutory basis for school accreditation, and make recommendations for a redesigned system of state school accreditation. The team met regularly for over a year to complete its work.

The proposed system, renamed "Michigan School Accreditation System" (MI-SAS), was reviewed at the December 9, 2008 Board meeting. Feedback was collected through an on-line survey, the MDE website and statewide presentations. The revised MI-SAS document and a summary of the feedback are attached.

The reaction to MI-SAS from the field was generally very positive. About 400 people responded to the on-line survey. The respondents reported MI-SAS to be clearer and more transparent than the current school accreditation system. The only concern raised through the on-line survey was that the field does not support adjustment of a school's accreditation based on Adequate Yearly Progress (AYP).

The Department also received comments regarding schools with improving student achievement. Because the proposed MI-SAS system uses student achievement data from a single school year to make an accreditation decision, a school may show enough improvement to make AYP, based on "safe harbor," and still be listed as unaccredited under MI-SAS. The Advisory Group concurred that a provision recognizing

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improvement in student achievement would be appropriate. Department staff modeled several approaches and incorporated into the MI-SAS document the provision that a school, where achievement improves ten or more percentage points from year to year in a subject, will be considered as having achieved the next higher threshold for classification as interim or accredited in that subject.

The reaction from the field on linking accreditation and AYP is documented in the attached summary of feedback. The Advisory Group strongly recommended that the AYP not be a part of MI-SAS. However, given Board direction on this issue, only a minor change was incorporated to denote those schools that fall into Interim Status only because of not making AYP.

The State Board of Education will be asked to approve the final Michigan School Accreditation System (MI-SAS) at the June 2009 meeting. Staff will forward the document for review by the education committees of the state Legislature. The intent is to implement the redesigned system in the 2009-2010 school year.

Michigan's School Accreditation System: From Education YES! To MI-SAS

Background

In March, 2002, the State Board of Education approved "Education YES!—A Yardstick for Excellent Schools" as the state's accreditation system to provide a means of setting standards for continuous school improvement and measuring the need for support and intervention for schools. Michigan's initiation of this accreditation system was concurrent with passage of No Child Left Behind (NCLB), which required states to have an accountability system. As a result, Education YES! has been Michigan's method to align state and federal requirements by blending state accountability and adequate yearly progress (AYP) reporting for NCLB.

Since 2002, the Board has made significant policy changes that resulted in the Michigan Merit Exam, expanded indicators for the School Improvement Framework self-assessment, MI-Access for students with special needs, testing in grades 3-8, and inclusion of a growth model. In addition to policy changes, educators, parents, and employers have identified concerns with the system and made numerous recommendations to make it more understandable and transparent.

As a result, the Michigan Department of Education (MDE) staff determined a major redesign of the current system was needed. A stakeholder group was convened to evaluate the current system, review the statutory basis for school accreditation, and make recommendations for a redesigned system of state school accreditation.

The redesign team, which met regularly for over a year to complete its work, analyzed the current system and identified the following concerns with Education YES!:

- Consequences of Michigan accreditation and NCLB AYP are not aligned.
 - It shifts emphasis from Michigan to federal requirements.
 - Its grading structure uses the federal Adequate Yearly Progress (AYP) status to lower the Michigan accreditation status.
- It needs additional clarity, usefulness, and credibility.
 - Educators, parents, and employers want and deserve an understandable one-stop information system.

In analyzing NCLB requirements, the team determined that Education YES! failed to distinguish between schools making progress but missing one or two of the 40-plus requirements from those not making progress and missing many or most of the requirements. The team concurred that Michigan needed a system that could make such distinctions as a means to identify schools most in need of interventions and support services.

The proposed redesign, the Michigan School Accreditation System (MI-SAS), addresses these concerns. It makes Michigan standards the primary determinants for the state's accreditation system. It recognizes academic progress in all core subjects, recognizes five and six year graduation rates as successes, and enables

schools to calculate their accreditation status. Using a "dashboard" display rather than a single letter grade, MI-SAS provides greater credibility, more transparent accountability, and increased usefulness to those interested in the continuous improvement of Michigan schools. The MI-SAS will report a school's accreditation status, as well as its AYP status and subgroup data as required by the Elementary and Secondary Education Act (ESEA). This will provide both state and federal data to identify those schools that merit the highest priority for support and intervention

PROPOSED REDESIGN: MICHIGAN SCHOOL ACCREDITATION SYSTEM (MI-SAS)

The MI-SAS is based on student achievement and compliance with Michigan statute. These components are combined to assign an Annual State Accreditation Status to each school. To provide educators, parents, and employers with a complete picture of the school, additional information about the school and its district, community, and the state is included as part of the "dashboard" display.

Each of these four elements is described below:

- 1) Student Achievement,
- 2) Compliance with Michigan Statute,
- 3) Annual State Accreditation Status, and
- 4) Additional School, District, Community, and State Information

1. Student Achievement.

MI-SAS sets standards for accreditation that demonstrate students are achieving at appropriate levels. Measurement of student achievement includes three components:

- Proficiency (elementary, middle, and high schools)
- Performance Level Change (elementary and middle school with annual grades 3-8 assessments)
- Provisionally proficient on the Michigan Merit Exam (high schools with 11th grade assessment)

Proficiency.

State standards for proficiency in core curriculum subjects are used to determine the accreditation status for all elementary, middle, and high schools. Based on assessment data for the four core subject areas of English language arts (reading and writing), mathematics, science, and social studies, a school's accreditation status is determined to be "summary accredited," "interim status," or "unaccredited" (Section MCL 380.1280 of the Revised School Code).

MI-SAS establishes the following proficiency standards to determine a school's accreditation status:

- **ACCREDITED:** No more than one subject below 60% proficient and no subjects below 35% proficient.
- **INTERIM STATUS:** Two or more subjects lower than 60% proficient but not lower than 35% proficient. **NOTE:** A school may also fall into Interim Status if it meets all standards for accreditation but does not make AYP. Such a school will be designated INTERIM AYP.
- **UNACCREDITED:** One or more subjects lower than 35% proficient.

The measures of student achievement include the Michigan Educational Assessment Program (MEAP), the Michigan Merit Examination (MME), and MI-Access (Michigan's alternate assessments for students with disabilities). The assessment data used to determine a school's accreditation status will use only the scores of students at the school for a full academic year prior to the assessment. Since the MEAP assessment (elementary and middle school) is given in the fall and covers content learned the previous year, feeder codes will be used to attribute the students' scores to the school attended during the prior school year. In contrast to federal AYP requirements, MI-SAS does not cap the number of students with proficient scores on the MI-Access assessments. All proficient scores on MI-Access will be included in the achievement calculation.

Performance Level Change.

Performance Level Change (PLC) is a new component for assessing student achievement that was approved for Michigan's use by the United States Department of Education for compliance with NCLB. PLC is important because it provides information about increases in student academic achievement that are greater than expected for one year of school. Because achievement "growth" can be calculated only for subject areas where students are tested in consecutive years, PLC is calculated only for English language arts and math for students in grades 3-8.

Students are counted as proficient if they show more than the expected improvement in their achievement level. This measure is based on the PLC model using scores that fall into the Improvement or Significant Improvement range. Performance Level Change allows schools to demonstrate increases in pupil achievement, the result of intensive efforts of students and staff, even though a student is not yet scoring in the proficient range on the MEAP assessment.

PLC enables schools to show their students may not yet be proficient, but achievement is improving. To determine the PLC for elementary and middle schools, the achievement levels (Not Proficient, Partially Proficient, Proficient and Advanced) for all grades for the four core subjects are totaled and students in the top two levels (proficient and advanced) are counted as proficient. Then for English language arts (ELA) and math, the following number of students is totaled:

- Students testing proficient but not improving
- Students improving but not proficient
- Students who are both proficient and improving.

Since Social Studies and Science are not tested annually, the PLC calculation cannot be used for these subjects and student test scores are simply proficient or not proficient. The totals of students in each category of proficient or not proficient are divided by the total number of students tested to arrive at the percentage of students proficient in each subject area (Attachment B: Calculation Example).

Proficient or Provisionally Proficient on the Michigan Merit Exam.

At the high school level, no subject area is tested at consecutive grade levels. Therefore, PLC cannot be measured for high schools. Instead, the MI-SAS determines the number of students, based on the Michigan Merit Exam (which includes the ACT, Michigan Content Expectations, and WorkKeys), who are proficient or provisionally proficient. Provisional proficiency uses a standard error

measurement to provide greater reliability and to eliminate any false negatives. This is similar to polling data that makes reference to "a margin of error of + or - 4%." The margin of error is applied to student scores that are just below the cut score.

Student achievement is based on the total of achievement levels for English language arts, math, science, and social studies. Then, for each subject, the following number of students is totaled:

- Students testing proficient
- Students provisionally proficient (within a margin of error).

These totals are divided by the total number of students tested to determine the percent proficient.

Improvement of Student Achievement

Performance Level Change (PLC) is used in cases where achievement is measured at adjacent grade levels in the same subject on the same state assessment. Improvement of student achievement (non-cohort growth) will be measured in the following cases:

- Science, Social Studies and Writing at all grade levels; and
- Mathematics and Reading at the high school level.

A school where achievement improves ten or more percentage points from year to year in a subject the school will be considered as having achieved the next higher threshold for classification as interim or accredited in that subject.

2. Compliance with Michigan Statute.

The second core element for accountability in the MI-SAS is a school's compliance with Michigan statute. For schools to be accredited, they must comply with basic accreditation requirements in MCL 380.1280 and with the requirement to employ only teachers who hold a valid teaching certificate (MCL 380.1233). The eight statutory requirements appear below.

The MI-SAS will measure compliance by evaluating schools on the following eight questions.

- Do 100% of the school's staff, as required, hold Michigan certification? (MCL 380.1233)
Is the school's annual School Improvement Plan published? (MCL 380.1204a)
- Are required curricula offered (MCL 380.1204a):
 - Grade Level Content Expectations in grades K-8?
 - Michigan Merit Curriculum in grades 9-12?
- Is a fully compliant Annual Report published? (MCL 380.1204a)
- Have the Performance Indicators or equivalent been submitted through the School Improvement Framework or AdvancED Standards and Assessment Report? (MCL 380.1204a)
- Are literacy and math tested annually in grades 1-5? (MCL 380.1280b)
- If the school was designated for participation in the National Assessment of Educational Progress (NAEP), did the school participate? (MCL 380.1280b)

- Is the high school six-year graduation rate 80% or above?
(MCL 380.1280b and MCL 388.1619)

If the answer to **any** one of these questions is “no” for two consecutive years, the school’s accreditation status is lowered one level even if the “no” is for a different question each year.

3. Annual State Accreditation Status.

Student achievement and compliance with Michigan statute are combined to annually assign a state accreditation label for each school. A school cannot be fully accredited if it does not make AYP. As illustrated below, accreditation status will be lowered from accredited to interim for any school year in which the school does not make AYP.

<i>Preliminary Accreditation Status</i>	<i>Final Accreditation Status</i>	
	Makes AYP	Does not make AYP
Accredited	Accredited	Interim
Interim	Interim	Interim
Unaccredited	Unaccredited	Unaccredited

With the closer alignment of accreditation and AYP, schools may be sorted into three categories:

- School is accredited and is making AYP.
- School is in interim status and may or may not be making AYP.
- School is unaccredited and may or may not be making AYP.

Note that state accreditation status is not related to federal Title I funding. A school in need of support and intervention should be treated the same regardless, whether:

- It receives Title I funds or not.
- The standards it doesn’t meet are federal or state

4. ADDITIONAL SCHOOL, DISTRICT, COMMUNITY, AND STATE INFORMATION.

In the same way that a car’s dashboard provides gauges with a variety of helpful information, MI-SAS displays various data elements to create a more complete picture of the school. These data elements are clustered into four areas: District Context, People/Programs, Success Indicators, and NCLB Performance. These elements are not included in the accreditation status calculation in the interests of credibility and transparency. That is, when a school is unaccredited, it is because of achievement and compliance with statute, not due to other variables. MI-SAS also includes space for the school or school district to report its own “points of pride.”

The District Context shows financial data comparing the district’s per pupil funding with the state average, the average teacher salary, the percent of funds spent on instruction as a percent of operating costs. Enrollment trends for both the building and district are displayed, along with the percentage of students in the building

from various feeder schools in the district and their annual state accreditation status.

People/Programs section shows the teacher/student ratio and percent of teachers receiving professional development. The percentage of students enrolled and participating in Career and Technical Education programs is displayed, as well as the percentage who are "concentrators" (i.e., A secondary student who has completed at least six of the twelve segments and is enrolled in the next segment). Finally, the different student populations served in the building are reported: English Language Learners, students eligible for Free and Reduced Price meals, and students with Special Needs.

The Success Indicators include post-secondary readiness (for high schools) to report the percentage of students who applied to post-secondary institutions, the percent who achieved a college ready score on the ACT, and the percent who achieved a workforce ready score on the WorkKeys assessment. Completion-success rates for high schools are reported for the percentage of students dually enrolled, graduated within six years, or dropped out of school. Schools also show the percentage of students making progress as English Language Learners and the 9th grade promotion rate. Schools may choose other data to report, such as Title I Distinguished Award, or Teacher of the Year. If a school is accredited through AdvancED (parent organization of North Central Accreditation), the accreditation logo appears in this section.

Michigan Department of Education

**Summary of Public Comment and Input on
Michigan's School Accreditation System (MI-SAS)**

The Superintendent of Public Instruction presented the proposed Michigan School Accreditation System (MI-SAS) to the Michigan State Board of Education in December, 2008. The Michigan Department of Education (MDE) sent the proposed accreditation standards out to all public schools, gathered input, and incorporated changes, as needed, before bringing the final MI-SAS standards back to the State Superintendent and State Board for approval. The Department held a period of public comment to receive input on MI-SAS during the period ending March 6, 2009.

The Department of Education created a special web page (www.michigan.gov/MI-SAS) devoted to input on MI-SAS. The following were made available through the page:

- The document describing MI-SAS, incorporating revisions made based on the Board's discussion;
- A PowerPoint overview of MI-SAS;
- A video of Department staff describing MI-SAS; and
- Details for providing input through
 - An online survey designed to solicit feedback and opinions on MI-SAS,
 - A dedicated email address at MISASquestions@michigan.gov, or
 - Participation in one of the designated public input sessions held in conjunction with major education conferences.

The Department received numerous responses to the survey and several communications, including questions, comments, and formal positions taken by educational organizations. This document summarizes the input.

Comments from Individuals

Several individuals offered comments supporting the proposed MI-SAS, such as "I am satisfied that the new system is much more fair." Many asked clarifying and procedural questions. There were no comments from individuals who opposed the proposed system.

A high school principal commented that because the proposed MI-SAS system uses student achievement data from a single school year to make an accreditation decision for the next year, a school may show enough improvement to make Adequate Yearly Progress (AYP) under the No Child Left Behind Act (NCLB), and be listed as unaccredited under MI-SAS. It is suggested that a provision be added to MI-SAS to address this issue.

Comments from Organizations

The Michigan Association of Secondary School Principals (MASSP) suggested the Explore assessment from ACT as the basis for a high school growth model. However, this proposal would not assess students at adjacent grade levels, as generally featured in federally approved growth models for Adequate Yearly Progress (AYP). Further, significant state appropriations would be needed to carry out this proposal. While an additional assessment is not recommended, recognizing improved student achievement (non-cohort growth) is recommended and has been incorporated into MI-SAS.

The Macomb County Association of School Administrators supported the proposed use of MI-Access and Performance Level Change in MI-SAS. The group called for a broader set of measures to be included in the accreditation decision. The group feels that student achievement, as measured by state assessments, should not be the "sole criterion" for accreditation. However, the recommendations do not identify any specific proposal for criteria that would compensate for low student achievement. The group also cited lack of a growth model at the high school level. Again, no specific proposal for a growth model at the high school is offered. The position does not address the adjustment for provisionally proficient student scores, which was developed to address this issue.

The Michigan Special Education Advisory Committee noted that MI-SAS as proposed uses a school's AYP status as a key indicator in the determination of accreditation. For those schools with subgroups whose performance results in the school failing to make AYP, interim status is the highest level of accreditation they can be awarded. Failing to make AYP because of subgroup performance should not suggest that the school is not performing or taking actions to support all children in achieving. In fact, those schools may be working the hardest to improve subgroup performance by employing different strategies and focusing resources to meet students' needs. The process may take two to three years to see results. The committee believes that work like this should be celebrated in the accreditation system as opposed to simply awarding the status of interim. Adding an indicator to the dashboard so parents and the public can readily see what factors are contributing to the interim status is essential. The Committee also commented that MI-Access, an alternate assessment based on alternate Michigan standards, is equivalent to the MEAP, an assessment based on Michigan standards.

Comments and Input from the Survey

About 400 individuals responded to the survey on MI-SAS. Almost all of the respondents are Michigan residents. Over 90% of the respondents identified themselves as educators, with about half of the educators being teachers.

Respondents found the MI-SAS document and the PowerPoint presentation easy to read and understand. In addition, they found the examples to be clearly presented. Respondents provided the following feedback in response to specific questions about MI-SAS:

91% support reporting proficiency and performance level change; and
81% support using provisional proficiency in addition to proficient scores for high school students.

While most supported using provisional proficiency as an adjustment to proficient scores on the Michigan Merit Examination, some expressed fear that this adjustment would be confusing to parents and the community. Many offered the observation that using an adjustment to include provisionally proficient scores is appropriate because you cannot compare year-to-year of scores at the high school level.

Other highlights from the survey on the topic of using student achievement in MI-SAS:

- 81% supported using achievement data from all four core subject areas of English language arts, mathematics, science, and social studies;
- 71% reported the student achievement targets for interim and accreditation as reasonable;
79% reported that the eight accreditation requirements seem reasonable;
and
Only 19% of respondents would add other requirements to the list.

Roughly as many respondents provided comments expressing the opinion that the standards were too low as those voicing that the standards are too high. An example comment supporting the standards said that "The numbers, 60 and 35, are perceived as attainable (not too high, not too low; requires focus, but not enough that you lose sight of the students for the achievements)." One respondent supported more demanding standards, expressing that "The target should be above 70%. We are not happy in classes when students are only at the 60% rate. Why should we accept this rate for accreditation?"

Almost all (87%) of those participating in the survey reported that the proposed relation of accreditation and Adequate Yearly Progress (AYP) was clear. However, only 46% felt that the proposed adjustment to the school's accreditation based on AYP status is reasonable. Samplings of the comments opposing this proposal include:

- It is likely that some changes in NCLB will be occurring within the next two years;
Large enrollment schools are punished unfairly by "30" subgroup number.
AYP appears too heavily weighted in this regard;
It's reasonable as long as no school ever has to meet the goal of 100% AYP, otherwise, this will not work;
- If a school meets the accreditation standards, then it should be accredited.
Perhaps a two year failure would be fair;
Multiple measures of student achievement are needed;

If you can have one without the other, than I question the value of having either standard;

- AYP measures unrealistic goals;
- In an alternative education program it is almost impossible to get the required participation rate on standardized tests, the required test scores and the required graduation rates.

In contrast, the following comments supported the proposed adjustment of state accreditation, based on AYP status:

- It recognizes the importance of the federal mandate;
So long as AYP is based on student growth - apples to apples, rather than on one year's class compared to the following year's class - apples to oranges;
Because we have to live with NCLB;
- Yes, tracking the sub-groups has to happen. It is too easy to allow sub-groups to fall between the cracks. This aspect keeps the spotlight on all students; and
(This requirement is) reasonable but difficult.